



# County of Santa Cruz

## HEALTH SERVICES AGENCY

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### ENVIRONMENTAL HEALTH

[www.co.santa-cruz.ca.us/eh/ehhome.htm](http://www.co.santa-cruz.ca.us/eh/ehhome.htm)

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### **RE: 2005-06 Consolidated Grants Program and the Draft Proposal Solicitation Package for Implementation Grants, Step 2**

The following comments are offered by Santa Cruz County and Agency partners to address our issues and concerns that arose during last month's Stakeholder Workshops on the 2005-06 Consolidated Grants Program and the Draft Proposal Solicitation Package for Implementation Grants, Step 2. Thank you for the ability to participate in the workshops through on-line communication. Unfortunately, it was hard to follow without video assistance. In addition, we were unable to hear if our comments were addressed as we had to evacuate the building for a fire drill. Therefore we are more formally submitting these same comments and others through this document.

The County's comments are concentrated on those issues that staff feels deserve more attention by the SWRCB. Although these comments are the product of a critical evaluation, staff hopes that the SWRCB accept the intent of the comments as constructive.

These bond monies do not capacity build the agencies administering the bonds instead that responsibility is passed down to the applicant. For example, it has cost the County of Santa Cruz Partners approximately \$100,000 on each of the two draft plans prepared as required for submittal of grant proposals. This figure doesn't include local partner staff time. In addition, the bond funds do not allow for administrative overhead. The concern is that the smaller scale partners that are instrumental in delivery of programs will not be able to afford to participate.

A "disadvantaged community" is defined by the CA Water Code, Section 79505.5(a) and is based on annual median **household** income (MHI). Unfortunately, this narrow definition unfairly does not account for communities that would qualify as disadvantaged if Mean **Family** Income (MFI) were used instead or as an alternate indicator. One of our communities, the town of Pajaro, CA, has an MFI that is below 80% of the state and is truly low income. The MHI indicator masks the low income nature of our community because there are many adults living under one roof in so many of the households. Therefore, MHI does not capture the very low

income nature of a community that has many working adults cohabitating under one roof. The criterion for Disadvantaged Community needs to be augmented with an additional category that uses MFI, or something similar, as an alternate measuring stick which earns equal credit in the reviewers' ranking system.

#### 2005-06 Consolidated Grants Program:

Critical to the efficient management of the program is the development of a realistic timeline. We understand this may require a legislative fix and if this is necessary it should be undertaken as soon as possible.

- Full proposal submittals should not be timed to occur during or just after the winter holiday season. Most authorizing boards have a limited number of meetings or recess during this period.
- Specifically, if the recommended project list goes to the SWRCB in September-November 2006 it is not realistic to assume the ability to encumber Proposition 40 funds by December 2006. Our experience has been that a minimum of four (4) months is required to execute a grant agreement and get appropriate board approvals. To meet a deadline to encumber funds by Dec. 2006 it is recommended that the recommended project list goes to the SWRCB by July-August 2006.
- Several of the grant programs require funds to be encumbered by December 2006 and for projects to be completed within a twenty-one month time period. It is not reasonable to expect the execution of complex, large dollar amount grant agreements and the associated implementation of potentially a numerous amount of projects under the agreements in this short a time period. It is suggested that the time period for completion be extended until 2010.

#### Proposed Match Requirements

- The award of bonus points for match greater than the amount required in the guidelines appears to only serve the purpose of giving an unfair advantage to more economically strong communities.
- A lower match requirement for planning projects versus implementation projects is supported because this is a critical first step towards forging partnerships of diverse entities with different funding abilities and interests.

The Santa Cruz County Partners fully support the recommendation of awarding 5% of total grant funds for smaller grants.

#### Draft Step 2 Implementation Grants Proposal Solicitation Package

It was reported that the call back for the IRWM Implementation Grants Step1 conceptual proposals is to occur in December 2005. We need to receive this feedback from Step 1 prior to the consolidated grant RFP being released in December. There will be little time to work on both

a Step 2 proposal and the consolidated grant proposal during December and January given the holidays.

For the IRWMP Step 1 grant application, the Santa Cruz County partners were involved in two different applications. It cost over \$100,000 each on consulting work to complete the applications. Each application measured over 2 inches thick in hard copy. Two months of full time staff work and consulting work was spent on re-stating requested information in multiple different ways. Specifically, the same information was cut and pasted, and repeated multiple times in each of the 13 required attachments. All involved agreed it was the most laborious application process ever experienced. Please consider substantially shortening and simplifying the information requested.

That being said, the FFAST system worked brilliantly. We very much appreciate a 'no-hard-copies-please' submission rule.

A retroactive date for counting match was extremely valuable. Please keep a retroactive date for match provision.

Economic analyses and Certifications of Feasibility will be costly to provide.

Letters of Support whether similar in format or unique should carry similar weight. The submittal of a signed "form" letter of support from an agency or organization proves the proposal has willing partners and community support.

It is important to take the time during this stage of development of the General Conditional Waiver of Waste Discharge Requirements to carefully craft the timelines and requirements to provide for a time and staff efficient process.

Thank you for the opportunity to offer these comments. If you have any questions, I can be reached at (831) 454-2453.

Respectfully,

*(Original signed by Donna Bradford, County of Santa Cruz)*

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